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June 5, 2003

Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

Reference:

MB Docket 02-14

MB Docket 02-166

MB Docket 02-331

I see the Salina, Utah 233C counterproposal of May 7, 2003 as the equivalent to my Salina, Utah 276C proposal. It would allow me to build the main transmitter site on Mount Terrill, and a possible booster station on White Pine Peak. I would have a wide area line-of-sight, that would not be available from Signal Peak.

Since the Salina, Utah proposal will not be needing to channel 300, there is no longer a need to move the Parowan, Utah 300C2 to 272C2, as per the counterproposal to MB Docket 02-14. This would further eliminate the need to move the Parowan, Utah 272C2 counterproposal to 294C2 in MB Docket 02-331.

I recently (May 9) acquired a sheet of the Annabella, Utah 7.5' map from USGS. I used the map to determine the coordinate of Signal Peak, on Glenwood Mountain. Since KBKL, 300C, Grand Junction, Colorado is not operating with the minimum HAAT to be a Class C operation, I could have used Signal Peak as a Salina, Utah 300C.

My experience with KCYQ, 229C, Richfield, Utah, has shown that a Glenwood Mountain transmitter site does not provide for long distance reception to the east, nor north to west. I have never received KCYQ to the east of Mount Terrill, nor to the north to west of the Pavant Range.

A Signal Peak transmitter site would have provided basically a northeast - south pattern due to the two north - south mountain ranges to the east and north to west of Glenwood Mountain. The actual service area of the Salina, Utah 300C would have been much like KCYQ's service area.

The area to the east of Mount Terrill is marginally served by three AM stations (KMTI, Manti, Utah, 650 kHz, 10 kW-D, 0.9 kW-N, DA-2; KOAL. Price, Utah, 750 kHz, 10 kW-D. 5 kW-N, DA-N; and KSLL, Price, Utah, 1080 kHz, 10 kW-D, 5 kW-CH, ND) when they are in their 10 kW modes. The area to the west of the Pavant Range is served by KNAK, Delta, Utah, 540 kHz, 1 kW-D, 0.013 kW-N, ND; KSVC, Richfield, Utah, 980 kHz, 5 kW-D, 1 kW-N, DA-N; KMGR, 239C, Delta, Utah; KLGL, 248C, Richfield, Utah; and several FM translators.

Millcreek and their counsel are also a party to a counterproposal to move a second station (MB Docket 02-290, November 18, 2002) into Coalville, Utah. The second station into Coalville mutes the reason why Millcreek through their counsel used to request that another channel be substituted for Salina, Utah 276C. The reason that was given was to replace KCUA, Coalville, so that KUUU could upgrade and change city of license. KPEB, 276C3, Humsville, Utah, was to replace KCUA in Coalville, as KCUA moves to Naples, Utah. The counterproposal to MB Docket 02-290 requested 248C for Coalville, Utah. This is the equivalent to what KPEB would have had as a Coalville, Utah 276C. According to the counterproposal, the group the owns the Franklin, Idaho 248C1 construction permit has common ownership with Millcreek.

To the best of my knowledge, the information contained in this document is correct. I will submit an application for the construction permit for the Salina, Utah 233C allotment.